

1 ROBERT K. SCOTT # 67466  
2 DAVID SCOTT MOHNEY #124426  
3 LAW OFFICES OF ROBERT K. SCOTT  
7700 Irvine Center Drive, Suite 605  
Irvine, CA 92618  
Telephone: (949) 753 4950  
4 Facsimile: (949) 753 4949

5 Attorneys for Plaintiff  
6 LAURIE ORANGE

7 WARREN H. NELSON, JR. #104744  
8 A PROFESSIONAL CORPORATION  
6161 El Cajon Boulevard, # 273  
9 San Diego, CA 92115  
Telephone: (619) 269 4212  
Facsimile: (619) 501 7948  
10 Email: nelson@rolando.sdccoxmail.com

11 Attorney for Defendant  
12 STANDARD INSURANCE COMPANY

13  
14 UNITED STATES DISTRICT COURT  
15 SOUTHERN DISTRICT OF CALIFORNIA

16 LAURIE ORANGE, } Case No.: 3:08-cv-00686 BTM-CAB  
17 Plaintiff, } JOINT MOTION TO DISMISS WITH  
18 } PREJUDICE  
19 vs. } No hearing set or required.  
20 }  
21 STANDARD INSURANCE }  
22 COMPANY, a corporation; and DOES }  
23 1 through 10, inclusive, }  
24 Defendants. }  
25

26  
27 This case has settled on terms that are confidential. The parties, plaintiff  
28 Laurie Orange and defendant Standard Insurance Company, pursuant to Local Rule

1 7.2(b), now jointly and respectfully move the Court for an Order dismissing this  
2 case with prejudice each party to bear her or its own attorney fees and costs.

3 Pursuant to Local Rule 7.2(c) and the Electronic Case Filing, CM/ECF,  
4 User's Manual, Southern District of California (revised July 2008), the Proposed  
5 Order for Dismissal With Prejudice has not been electronically filed but has  
6 instead been emailed to the Chambers of the Honorable Barry T. Moskowitz,  
7 Judge, U.S. District Court, Southern District of California, with a courtesy copy  
8 emailed to the Chambers of the Honorable Cathy Ann Bencivengo, Magistrate  
9 Judge, U.S. District Court, Southern District of California.

10 Dated: August 28, 2008

11 /s/Warren H. Nelson, Jr.  
12 WARREN H. NELSON, JR.  
13 A PROFESSIONAL CORPORATION  
14 6161 El Cajon Boulevard, # 273  
15 San Diego, CA 92115

16 Dated: August 28, 2008

17 /s/Robert K. Scott  
18 ROBERT K. SCOTT  
19 DAVID SCOTT MOHNEY  
20 LAW OFFICES OF ROBERT K. SCOTT  
21 7700 Irvine Center Drive, Suite 605  
22 Irvine, CA 92618

23 Attorneys for Plaintiff  
24 LAURIE ORANGE

1 DOCKET No. 3:08-cv-00686 BTM-CAB  
2

Orange v. Standard Insurance Company, et al.

3 PROOF OF SERVICE BY MAIL

4 I, Warren H. Nelson, Jr., the undersigned, hereby certify and declare under penalty of  
5 perjury that I am over the age of 18 years and am not a party to this action. My business address  
6 is Warren H. Nelson, Jr., A Professional Corporation, 6161 El Cajon Blvd., # 273, San Diego,  
7 CA 92115, telephone (619) 269-4212, facsimile (619) 501-7948. On the 28<sup>th</sup> day of August  
8 2008, I served a true copy of the foregoing document titled exactly:

9 JOINT MOTION TO DISMISS WITH PREJUDICE

10 By placing it/ in an addressed sealed envelope with correct postage affixed thereto and  
11 personally depositing it in the United States mail. I addressed the mailing envelope to the  
12 following:

13 ROBERT K. SCOTT  
14 LAW OFFICES OF ROBERT K. SCOTT  
15 7700 Irvine Center Drive, Suite 605  
Irvine, CA 92618

16 I declare under penalty of perjury that the foregoing is true and correct. Executed this  
17 28<sup>th</sup> day of August 2008 at San Diego, California.

18  
19 /s/Warren H. Nelson, Jr.  
Warren H. Nelson, Jr.